

LITE DEPALMA GREENBERG & AFANADOR, LLC

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Counsel for Plaintiff Ira Polly

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: APPLE INC. SMARTPHONE
ANTITRUST LITIGATION

*This Document Relates to:
All Direct Purchaser Plaintiff Actions*

Case No. 24-MD-3113 (JXN-LDW)

**NOTICE OF MOTION TO
APPOINT INTERIM CO-LEAD
CLASS COUNSEL
FOR DIRECT PURCHASER
PLAINTIFFS**

PLEASE TAKE NOTICE that on September 3, 2024, at 9:00 a.m., or as soon thereafter as counsel may be heard, Plaintiff Shoshi Goldfus in *Goldfus v. Apple Inc.*, Case No. 2:24-cv-04108 (JXN-LDW) (D.N.J.), and Plaintiff Ira Polly in *Polly v. Apple Inc.*, Case No. 2:24-cv-07849 (JXN-LDW) (D.N.J.), individually and on behalf of all others similarly situated (collectively “Plaintiffs”), will move before the Honorable Julien X. Neals U.S.D.J. at the United States District Court for the District

of New Jersey, Martin Luther King Building and United States Courthouse, 50 Walnut Street, Newark, New Jersey 07102, for an order appointing Interim Co-Lead Counsel for Plaintiffs, approving Interim Co-Lead Counsel for Plaintiffs pursuant to Fed. R. Civ. P. 23(g)(3), and granting such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Plaintiffs will rely on the accompanying Memorandum of Law and Declaration of Joseph J. DePalma. A proposed form of Order is also submitted herewith.

Respectfully submitted,

**LITE DEPALMA GREENBERG
& AFANADOR, LLC**

Dated: August 8, 2024

/s/ Joseph J. DePalma

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* admitted *pro hac vice*
***pro hac vice* forthcoming